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MEMORANDUM FOR: Deputy Director for Administration

SUBJECT : Provision of a DCI Alternate Office with Colocation of ICS

REFERENCE : Memo dtd 19 Feb 76 to DCI fr DDA, Same Subject

Jack:

In accordance with the guidelines of the referent, attached is a detailed analysis of time and cost impact of establishment of an alternate DCI office with colocation of ICS. The study addresses the problem in phased increments through a series of options.

25X9 The initial option provides on the first floor of East Building suitable space for the Director, his secretary, private offices for the other Committee on Foreign Intelligence (CFI) members, four offices for staff/secretarial personnel, conference space, and a limited pantry. Attachment 3 to the study is a floor plan of this area. [REDACTED] OTS personnel currently occupying one end of this floor must be relocated. This option requires refurbishment of the space and, accordingly, provision of a temporary, alternate office. One consideration is to temporarily relocate the Director, OTS (D/OTS), to elsewhere within South Building (by relocating up to 10 OTS personnel out of the Building) and utilize the old DCI suite on an interim basis until the East first floor is ready. Minimal refurbishment of the first floor can be completed in 30 days at a cost of \$25,000. If a permanent, high-quality renovation is desired, time required is up to 90 days with a cost of \$102,000.

25X9 Option 2 provides space on the second floor and basement of East Building for [REDACTED] ICS personnel. This option would give the CFI a staff presence in the interim until the entire ICS could be colocated with the Director. Option 2, which could start simultaneously with Option 1, could be completed in 3 months at a cost of \$180,000. This option necessitates relocation of [REDACTED] OTS personnel and the GSA Char and Guard Forces locker facilities now occupying the space.

Option 2 provides almost 6,000 square feet (sq. ft.) of ICS space, therefore, Option 3 is to provide an additional 12,000 sq. ft. of space in South Building for a total of 18,000 sq. ft. for ICS.

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In order to make this space available, [REDACTED] OTS personnel now in South Building office space must be relocated. It was assumed that only office space would be made available for ICS use because of time constraints in relocating lab or other technical functions. No attempt was made to select OTS components for relocation; it is obvious, however, that the organizational impact would be profound. As a result of a number of ongoing moves within the Agency's Metropolitan Washington area buildings, sufficient vacant space now exists in the Ames Building in Rosslyn to house these personnel plus the OTS personnel relocated under Options 1 and 2 for a total of approximately [REDACTED]. Because Ames is almost fully committed under our preplanned moves, this could only be a temporary relocation without provision eventually being made to house the components originally scheduled to occupy this space. Option 3 requires 150 days to effect and has capital costs of \$483,000 plus annual lease costs of \$210,000.

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Option 4 considers the possibility of the DCI outside office plus an undetermined number of ICS personnel in the new Executive Office Building (EOB) space. Cost and time estimates are provided as 3 months and \$25,000, however, these estimates as well as space availability are only speculative pending formal approach to GSA at the appropriate level.

Option 5 cites a 9-month and \$295,000 estimate (plus \$250,000 annual recurring costs) to consolidate the DCI outside office and ICS in high-quality leased space in the area near the White House.

A data tabulation of all options is provided in Attachment 4 to the study.

It should be noted that many of the above options are mutually supportive and offer alternate possibilities. For example, Option 1 could be exercised to provide quick space in East Building pending obtaining space in the EOB. It is also possible that the Director may determine that his CFI function warrants only a partial relocation of ICS, therefore, Option 2, provision of space for [REDACTED] ICS personnel, may be all that is required.

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The study addresses only the physical possibilities of proposed options and some consideration should be given to the displacement effect that each option has on OTS. It is also noteworthy that additional leased space must be acquired whether the entirety of ICS is located in either 2430 E Street or in leased space. The [REDACTED] OTS personnel now in East Building are already in a separate building from the remainder of OTS; therefore, their relocation to Rosslyn merely increases a geographical separation. While somewhat inefficient from the OTS standpoint, the loss of East Building space should not be a major operational factor. The removal of up to [REDACTED] OTS personnel from South Building, however, is considered to have an

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unavoidably major impact on OTS's operating efficiency. This relocation of OTS personnel would also completely upset current space moves now in progress and necessitate a complete rethinking of our external building occupancy.

Clearly the options that would have the least impact on the Agency's facility utilization but would provide rapid response to existing DCI requirements would be to exercise Options 1, 2, and 5. Specifically, the DCI and CFI would be established in East Building within 30 days. Within another 60 days, some [REDACTED] ICS personnel could be relocated to provide staff assistance. Assuming leasing action had been started at the same time that Option 1 was activated, after 6 months the DCI and all of ICS could be relocated to leased space. The relocated OTS personnel could then be returned to East Building. Finally, this series of options offers the distinct advantage of readily available expansion space should operating experience indicate that more staffs or other components be colocated with the DCI outside office and ICS.

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Although the study parameters excluded relocation of technical/lab functions, a final consideration might be selection of Central Building for ICS vice South Building. We already know that D/OTS is willing to shear off this function if necessary, and the 19,000 sq. ft. size is optimal for ICS. Although the cost is high and time to effect relocation extensive, it is conceivable that the effect of exercising Options 1 and 2 (the establishment of a DCI alternate office with [REDACTED] ICS personnel colocated) may be sufficiently satisfactory to permit a longer time lapse before relocating the remainder of ICS. Certainly it is more attractive than seizing the majority of the office space in South Building and could be developed as a possible option.

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Michael J. Malanick  
Director of Logistics

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PROVISION OF AN ALTERNATE OFFICE FOR THE  
DIRECTOR OF CENTRAL INTELLIGENCE  
AND  
COMMITTEE ON FOREIGN INTELLIGENCE  
WITH  
COLOCATION OF THE INTELLIGENCE COMMUNITY STAFF

Feasibility Study  
Prepared By  
Real Estate and Construction Division  
Office of Logistics  
23 February 1976

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OUTLINE

- I. Definition of Requirement
- II. Background
  - A. DCI and ICS Space Utilization in Headquarters
  - B. Current Agency-Controlled Vacant Space in the Metropolitan Washington Area
  - C. Description Facilities and Utilization of 2430 E Street Complex
  - D. Space Availability
- III. Options and Discussions
- IV. Summary

List of Attachments

- Attachment 1: Available Leased Space (Data Tabulation)
- Attachment 2: Available Lease Space (Location Map)
- Attachment 3: Floor Plan, First Floor, East Building
- Attachment 4: Summary Data Sheet, Options A through E

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## I. Definition of Requirement:

It is required to provide on an immediate basis an alternate or "outside" DCI office in order to make space available for the Director, the Committee on Foreign Intelligence (CFI), and their personal immediate staffs. Additionally, also as soon as possible, provide adjacent space to relocate the Intelligence Community Staff (ICS) while retaining a small residual ICS capability at the Langley Headquarters Building. ICS requirements are estimated at up to 18,000 square feet (sq. ft.).

## II. Background:

### A. DCI and ICS Space Utilization in Headquarters

The suite of rooms used by the DCI encompasses 7,400 sq. ft. along the 7D and 7E corridors and houses the Director's immediate staff, conference room, registry, reception areas, and a dining room. ICS and USIB offices are currently located near the DCI suite in 7C, 7D, 7E, and 6E corridor areas and cover 18,144 sq. ft. In addition, USIB has levied an immediate requirement for 3,600 sq. ft. of space in Headquarters for new functions and 19 additional people. Altogether, the suites for the DCI, ICS, and USIB with new requirements added total about 29,100 sq. ft. Most of this space is typical of normal high-grade commercial offices. Of the total, 4,335 sq. ft. is built to secure area standards with fire detection devices. Throughout, phone service is heavier than normal and secure phone service is required for nearly every desk.

### B. Current Agency-Controlled Vacant Space in the Metropolitan Washington Area (MWA)

1. At present, it is projected that approximately 17,600 sq. ft. of excess space will exist in Agency buildings; 7,474 sq. ft. in the Chamber of Commerce (C. of C.) Building, Arlington; a total of 5,080 sq. ft. on three floors in the Ames Building, Rosslyn; 1,600 sq. ft. in the Key Building, Rosslyn; and approximately 3,500 sq. ft. in the [REDACTED]. All of this space is leased and practicable only for relocation of office functions. Although it is technically feasible to relocate a single component into this space, the fragmentation over four buildings in three locations is obvious.

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2. Projected vacancies do not reflect the space situation as of the moment because the Agency is in the middle of a major move to new buildings. This ongoing move relocates personnel from Headquarters and the Magazine, Ames, and Key Buildings in Rosslyn to the recently acquired [REDACTED] and the second floor of [REDACTED]. Commitment has been made to drop the substandard Magazine Building in August. Renovation is in progress on two floors of the Ames Building and is scheduled for four others to eventually receive components from Magazine Building, Headquarters Building, and C. of C. At the moment, however, one full floor (10,000 sq. ft.) of Ames Building is unoccupied and can be reserved if projected consolidations from C. of C. Building are held in abeyance. If projected relocations from Headquarters to Ames are postponed and consolidation of existing components effected, a second floor could be made available for a total of 20,000 sq. ft.

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3. Compounding the overall space situation is the FY 76 requirement for approximately 42,000 sq. ft. of space in Headquarters to support already approved and in-progress component expansions (e.g., OGC, IG) and new programs (e.g., OJCS equipment expansions). Approximately 30,000 sq. ft. of this requirement will be met circa April by relocation of Headquarters components [REDACTED] and another 3,500 sq. ft. by relocation to Ames. The net result is an immediate 7,000 to 9,000 sq. ft. requirement in the already overcrowded Headquarters Building which must be offset against vacancies in external buildings. Finally, substantial FY 77 space requirements have been identified for Headquarters. These existing and projected space requirements, plus current overcrowding, provided the basis for recently requesting GSA to acquire the remaining 70,000 sq. ft. at the [REDACTED] site; an action expected to require at least a year to effect. In sum, the apparent existence of vacant space is, in fact, transitional and geographical. The actual Agency MWA space posture is that requirements significantly exceed available space.

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#### C. Description Facilities and Utilization of 2430 E Street Complex

The 2430 E Street complex, constructed in the early 1900's, now comprises three buildings: East, Central, and South. The three buildings have approximately 70,000 sq. ft. of space, exclusively occupied by the Office of Technical Service(OTS) except for a small area in East Building reserved for the DCI. OTS space utilization is heavily technical, with approximately 37,000 sq. ft. or over 50 percent of the space dedicated to labs or other special-purpose functions. The smallest of these facilities is East Building with [REDACTED] people occupying 8,192 sq. ft. of Agency space, including 1,540 sq. ft. of unoccupied DCI space. Central Building houses [REDACTED] people in 19,213 sq. ft., and the largest, South Building, houses [REDACTED] people in approximately 44,000 sq. ft.

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1. East Building is a two-story building with a basement. Each floor has just over 3,000 sq. ft. The basement is currently of little use except for storage and some shop area. GSA Guards and Char Force have been assigned space on this basement level for their locker rooms. The ceilings are low and generally cluttered with exposed piping. The first floor has high ceilings and heavy-load bearing masonry walls. This space has most recently been used as an alternate DCI suite. The second floor is made up of standard office space, and partitions on this floor may be relocated as desired.

2. South Building consists of three floors plus a basement and an attic. Each floor has between 9,000 and 10,000 sq. ft. The basement is made up largely of custom-designed laboratory space, the majority being wet chemistry laboratories. There are also physics and photography laboratories in this area as well as utility and storage space. Approximately one-third of the first floor is occupied by a chemistry laboratory and a student training photo facility with 12 dark rooms. The remainder of the first floor is general office space plus a snack bar. The second floor is all general office including a panelled executive office (formerly the DCI suite) and a specially equipped conference room. The third floor is also general office space except for a telephone equipment room which occupies 2,200 sq. ft. The attic has a photography laboratory and some office space located in one end. The remainder of the attic has been condemned and is used only for minimum access storage space.

3. Central Building is made up of two floors and a basement, each floor having approximately 6,500 sq. ft. The basement is primarily light industrial-type space, with some heavy printing and reproduction equipment; i.e., printing presses, linotype machines, and other related equipment. Approximately one-fourth of the first floor is equipped as a large dark room and contains a number of heavy wall-mounted cameras as well as much photographic processing equipment, i.e., photography sinks and dryers. This floor also contains [REDACTED]

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[REDACTED]. The remainder of this floor houses a graphics shop with a paint spray facility and some offices. The third floor consists of office space, several small laboratories, and several file areas provided with custom-built CO<sub>2</sub> fire extinguishing systems.

In general, these buildings are cooled by window air-conditioning units. There are a few scattered air-conditioning package units which serve several special-purpose rooms. Heating is provided by steam to radiators which are randomly located under windows but frequently along interior partitions. This condition, coupled with the existing window spacing, makes partition relocation to obtain efficient use of space quite difficult. Elec-

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mounted.

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There are 250 parking spaces available for Agency use in five locations adjacent to the buildings. This averages to approximately [REDACTED] per space. There are also five visitor spaces plus two spaces reserved for the DCI. Over one-half of the total spaces are what might be referred to as horizontally stacked. For example, adjacent to Central Building, up to six cars may be parked end-to-end. Under these conditions and unless other arrangements are made, the first car to arrive in the morning may have to be the last car to leave at night. Parking around the quadrangle has been maximized to the point where traffic is congested but passable.

#### D. Space Availability

To date the Agency has generally acquired all of its overt administrative space in the MWA through GSA (the legal necessity for this methodology has not been established). At the current time, GSA has a "freeze" on acquisition of leased space because of internal funding limitations.

1. Government-owned space: A preliminary survey indicates that no suitable Government-owned space is currently vacant. A GSA official has indicated, however, that if a request was to be made from appropriate levels within the Agency, space might be made available within the new Executive Office Building (EOB) in an undetermined amount. Space would be acquired by dislocation of existing, unspecified Commissions. The GSA source declined to be specific, however, stating that space availability was inversely proportional to the amount demanded; i.e., " . . . the less required, the easier it would be to get . . . . "

2. Agency real estate officers have determined that a number of prime-quality office buildings located in the area bounded by 21st and Connecticut Avenue between K Street and M Street have available space for lease in amounts up to 70,000 sq. ft. All of this space is of top quality and located in a prestigious area, however, rates vary from \$8 per sq. ft. to \$10 per sq. ft. which are in excess of GSA's maximum rental rate criteria. Most buildings have off-street

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rental parking available in proportion to the amount of space leased. Building data tabulations and locations are shown in Attachments 1 and 2.

### III. Options and Discussion:

As noted in Section II., the Agency has no suitable, readily available space to meet the requirement for a DCI "outside" office with adjacent office space for ICS. Accordingly, options are restricted to relocation of existing Agency components to make space available or to acquisition of new facilities. It is considered that the 2430 E Street complex is the only Agency-controlled facility which meets requirements; therefore, relocation options are restricted to that facility or to acquisition.

#### A. Option 1: Establish the DCI Alternate Office on the First Floor of East Building.

1. Concept: By utilizing the existing 1,540 sq. ft. of DCI space and relocating the [REDACTED] OTS personnel from the remainder of the first floor, a 2,980 sq. ft. nucleus office can be established. This floor will provide private offices for the DCI, the DCI secretary, and both CFI members. Four other offices are available for staff/secretarial personnel and sufficient space remains to establish both a large and a small conference area plus a small "pantry/coffee" area (see Attachment 3). The entire area requires extensive refurbishing and replacement of lighting fixtures, although no major changes are contemplated for electrical or HVAC (heating, ventilating, and air-conditioning) systems. Minor patching of walls, repainting and refurbishing, installation of rugs and furniture, and installation of KY-3 secure phone system will require 30 days. Total costs are estimated at \$25,000. A second more permanent refurbishment which completely restores wall surfaces, improves heating control, and removes all unnecessary conduit and abandoned utilities systems provides a significantly improved appearance. Because of the extensive nature of this renovation, time is estimated at up to 90 days with a cost of \$102,000.

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2. Implementation: In order to refurbish the first floor within a 30-day time frame, the area will not be available for DCI use. A possible, alternate, temporary area is the old DCI office/conference complex now occupied by the Director, OTS (D/OTS). If D/OTS is displaced within South Building (by relocating an equivalent sized component from elsewhere within the building), the DCI and CFI can utilize this space for the interim period. It will therefore be necessary to relocate [REDACTED] of the OTS personnel from East Building, plus an additional, approximate [REDACTED] officers from South Building to vacant space (probably in Rosslyn which is convenient to 2430 E Street).

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B. Option 2: Establish ICS Offices on the Second Floor and in Basement of East Building.

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1. Concept: By relocation of [REDACTED] OTS personnel to existing Agency vacant space and relocation of the GSA Guard and Char Force personnel from the basement, approximately 5,300 sq. ft. can be vacated for conversion to ICS office space. Using established average but austere space allocation criteria, between [REDACTED] staff and admin/secretarial personnel can be accommodated. The second floor will require additional KY-3 and standard telephone service. No major changes in lighting or HVAC systems are contemplated; however, complete refurbishment is necessary. Greater changes will be required in the basement area; some partitions will be replaced, a new ceiling will be installed in part of the area, and the lighting system upgraded. It is estimated that 90 days will be required for completion of the second floor and the basement. Cost is estimated at \$180,000.

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2. Implementation: The [REDACTED] OTS personnel can be relocated to existing Agency vacant space in Rosslyn; however, this will require reallocation of space now planned for other utilization as a result of building changes now in progress. GSA will be requested to surrender the Guard/Char Force area of the basement; however, delays may be encountered inasmuch as GSA will have to locate alternate space. If DCI use is compatible with ongoing construction activities in the basement and second floor (work could be stopped during meetings or other noise-sensitive activities), the DCI space schedule on the first floor would remain unchanged. If, however, it is desired to prepare the entire area before occupancy, the DCI temporary "outside" office would have to remain in South Building for an additional 60 days while all construction activities were completed.

C. Option 3: DCI "Outside" Office East Building, Remainder of East Building ICS, Remainder ICS South Building.

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1. Concept: By relocating up to [REDACTED] OTS personnel from office areas in South Building, 12,000 sq. ft. can be made available to house the remainder of ICS. No major change in electrical or HVAC systems is contemplated, however, partitioning will have to be reconfigured to match the ICS and remaining OTS organizations. Work contemplated includes upgrading the number of KY-3 and standard telephone lines, plus refurbishment of the general area. Elapsed time to effect this option is estimated at 150 days with an estimated capital cost of \$483,000 plus a recurring annual lease cost of \$240,000.

2. Implementation: The requirements for relocation of additional OTS personnel exceeds projections for available Agency space. Although OTS personnel could be temporarily housed in Rosslyn, new leased space would have to be obtained through GSA either for OTS or for components currently scheduled to relocate to Rosslyn. Selection of this space, design of necessary alterations,

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negotiations with the landlord, and implementation of alterations, plus the physical move are estimated to require several months. GSA will require at least a request for waiver and possibly additional funding in order to proceed with leasing action. It may be necessary for the Agency to initiate direct leasing action. The sum total of OTS personnel now relocated, including Options 1 and 2, is approximately [REDACTED] with the obvious fragmentation of the Office.

D. Option 4: DCI "Outside" Office to New EOB Plus Space for Undetermined Number of Staff.

1. Concept: As noted in Section II.C., it is probable that a limited amount of space can be obtained in the new EOB by displacement of existing components. As also noted previously, the ease of acquisition would be inversely proportional to the volume of space required. It is considered doubtful that an area as great as the 21,000 sq. ft. required for the DCI and the entire ICS would be available. It is expected, however, that an area large enough to provide the complete DCI "outside" office plus limited ICS support could be made available. Cost and time parameters are difficult to establish without consulting GSA, however, it is expected that cost would approximate that of Option 1, i.e., \$25,000. Time for relocation would depend upon the availability of space for the dispossessed elements and is guessed at not less than 3 months.

2. Implementation: Senior Agency personnel would have to approach GSA at at least the Regional Commissioner level to determine availability of space and implementing procedures. Assuming space could be made available, as noted above, relocation of the displaced elements to other Federal space would be required.

E. Option 5: DCI "Outside" Office Plus Entire ICS Plus Other Staffs/Operations Center as Desired to Leased Space.

1. Concept: As noted in paragraph II.C., many buildings have high-quality space available for lease in the prestigious area near the White House. Space is available in increments of 20,000 sq. ft. to 70,000 sq. ft. with the majority of the buildings having 50,000 or more sq. ft. This concept permits establishment of a DCI "outside" office plus relocation of the entire ICS into space with few, if any, physical constraints. Optimal flexibility is permitted to acquire additional space should it be desired to subsequently relocate other staffs. Modifications required include construction of secure areas, design and location of office partitions, and installation of a secure telephone system. Costs are estimated at \$295,000 with implementing time estimated at 9 months. Recurring annual lease costs of \$250,000 would also be incurred.

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2. Implementation: It would be necessary for the Agency to request GSA to execute a lease on an available building. Because of GSA's "freeze" on leasing and rental ceiling mentioned in Section II.C., it is probable that a waiver would have to be obtained. The Agency might have to lease directly, and, as noted, legal precedence has not been established for Agency leasing of administrative space. The majority of time delay anticipated would be necessary to effect lease negotiations, layout design, modification cost estimates, and actual modification.

IV. Summary:

Provision of an outside DCI office with colocation of the majority of ICS is possible at either 2430 E Street or in new leased space. Because of the current Agency space posture, however, total relocation of ICS is only practicable if additional space is eventually leased, either for ICS or for dislocated 2430 E Street personnel. A data tabulation of all options is provided in Attachment 4.

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Approved For Release 2001/08/07 : CIA-RDP79-00498A000100130029-5

AVAILABLE LEASED SPACE

BUILDING ADDRESS	AREA (SQ. FT.)	COST PER SQ. FT.	MONTHLY RANGE IN COST	REALTY COMPANY	INDIVIDUAL CONTACTED	TELE. NO.	REMARKS
1. 1055 Thomas Jefferson St.	60,000	9.25	\$50	Julien J. Studley, Inc.	Fred Ezra	965-8880	
2. Dodge Bldg., 3217 K St.	70,000	10-12	\$20	Shannon & Luchs	Fred Wall	659-7114	Completion 5/76 - Rate high because \$4 million overrun.
3. 1125-19th Street	70,000	8.75-9.25	\$50	Julien J. Studley, Inc.	Fred Ezra	965-8880	12,700 sq. ft. per floor. 4, 5, 6, 7, 8 floors available
4. 20th & K Streets	50,000	7	Not Avail.	Julien J. Studley, Inc.	Fred Ezra	965-8880	Older bldg. Space available is space vacated by NADA.
5. 1200 M Street	70,000	8.95-10	\$65	Oliver T. Carr	Don Bresnahan	296-8700	25,000 sq. ft. per floor 8 stories.
6. 2101 L Street	70,000	8-8.50	\$45	Charles E. Smith		296-2218	35,000 sq. ft. per floor.
7. 1020-19th Street	70,000	8.50	\$60	Shannon & Luchs	Fred Wall	659-7114	
8. 2030 M Street	70,000	8.25	\$60	Shannon & Luchs	Fred Wall	659-7114	
9. Longfellow Bldg. Conn. & M Street	30,000	7-7.50	Not Avail.	Heffelfinger	Heffelfinger	281-7800	1-1/2 floor available.
10. 2033 K Street	20,000	8.75		Quadrangle Dev.		293-2700	102,000 sq. ft. in Bldg. Only 20,000 left.



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Att 3





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Description	Time	Modification Costs	Recurring Annual Lease Costs	Comments
Option 1a - DCI Outside Office on first floor East. Space provided for CFI, DCI secretary, four offices, two conference rooms, pantry. Refurbishment minimal only.	30 days	\$ 25,000	---	Temporary outside office required during modification. ■ OTS personnel relocated. 25X9
Option 1b - Same as 1a except permanent, high-quality refurbishment. 25X9	80-90 days	\$102,000	---	---
Option 2 - ■ ICS personnel to second floor and basement East.	90 days	\$180,000	---	GSA Guards and Char Force relocated. ■ OTS personnel relocated. 25X9
Option 3 - 12,000 sq. ft. office for ICS in South (total 18,000 sq. ft. South and East).	150 days	\$483,000	\$210,000	Up to ■ OTS personnel temporarily relocated. Replacement leased space required. 25X9
Option 4 - DCI Outside Office plus Indeterminate No. ICS to EOB.	90 days	\$ 25,000	\$ 90,000	Dependent upon availability space. Cost and time estimate speculative.
Option 5 - DCI Outside Office and ICS to new leased space.	9 months	\$295,000	\$250,000	GSA waiver required. Space available for additional staffs if desired.

## ROUTING AND RECORD SHEET

**SUBJECT:** (Optional)

Provision of a DCI Alternate Office with Colocation of ICS

**FROM:**

Michael J. Malanick  
Director of Logistics

**EXTENSION**

**NO.**

**DATE**

23 February 1976

**TO:** (Officer designation, room number, and building)

**DATE**

RECEIVED

FORWARDED

**OFFICER'S INITIALS**

**COMMENTS** (Number each comment to show from whom to whom. Draw a line across column after each comment.)

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